

Before the FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of 2002 Biennial Regulatory Review -
Review of the Commission's Broadcast Ownership Rules
and Other Rules Adopted Pursuant to Section 202
of the Telecommunications Act of 1996,
Notice of Proposed Rulemaking,
MM Docket No. 02-277, (rel. Sept. 23, 2002)

To: The Secretary, FCC Commissioners, and Chief, Media Bureau

I would like to reply to the comment filed by Clear Channel
Communications, Inc. Their comment is an excellent illustration of the
lies the major media companies are telling in their pursuit of
deregulation. Clear Channel states:

•Clear Channel [has] demonstrated that diversity and competition, the
Commission's traditional public interest goals, are adequately addressed
by the modern media marketplace, where consumers have an abundant array of
choices for their news and entertainment and the various media compete for
viewers and advertisers. • They quote the D.C. Circuit Court in their
interpretation of Section 202-H as meaning, in terms of deregulation,
•Damn the torpedoes! Full speed ahead! •

Going •full speed ahead• with deregulation would be extremely damaging to
our nation, our democracy, and our citizens. Clear Channel's record in
radio, contrary to their blithe assertions, is the best cautionary tale
that could be told!

DIVERSITY • Clear Channel has eliminated thousands of local programmers
and radio personalities and created a numbing uniformity of programming,
dictated from corporate headquarters, on their 1,200 radio stations across
the country. Their talk of •new formats• obscures the fact that within
each •format• they control has grown an unprecedented sameness. Jim
Richards, Clear Channel director of FM programming in San Diego, CA,
acknowledged that uniformity of programming is a goal for Clear Channel in
an interview in the San Diego Star Tribune 7/30/2002. Richards said, •A
McDonald's employee can't all of a sudden put ketchup on a Big Mac. Why
is radio any different? •

LOCALISM • Clear Channel doesn't mention this stated goal that the FCC
promotes in media in their comments, for good reason. It's well known
that localism has all but disappeared from their voice-tracked and
centrally-programmed radio stations. Not only the lesser-listened to
dayparts of nights, overnights and weekends, but increasingly the prime
drive-time and midday dayparts, have been automated with DJ voices from
distant towns, as illustrated by a segment of the TV program •NOW With
Bill Moyers• earlier this year.

COMPETITION • See Jam Productions• lawsuit in Chicago against Clear
Channel, or Nobody In Particular Presents• lawsuit in Denver, or the
award-winning series of articles on Salon.com, or the excellent coverage
over the past few years in the Los Angeles Times, or talk to any sales
manager or salesperson at a stand-alone or small group radio station in
competition with Clear Channel, to learn about the anti-competitive
business practices they have engaged in since deregulation allowed them to

achieve their present size.

Sincerely,

Karen Peterson